

July 24, 2006

California Environmental Protection Agency  
Unified Program Section  
1001 "I" Street, 2<sup>nd</sup> Floor  
Sacramento, CA 95812  
Attention: Dennis Karidis

**SUBJECT: Response to Evaluation Summary of Findings –  
City of Glendale, Fire Department / Environmental Management Center**

### **BACKGROUND INFORMATION**

**CUPA:** Glendale City Fire Department

**Date of Evaluation:** March 15, 2006

### **State Evaluation Team**

**Cal/EPA Team Leader:** Kareem Taylor

**DTSC Evaluator:** Tom Asoo

### **Deficiencies and Corrective Actions Status Report**

1. **Deficiency:** The Self-Audit did not include all the elements in a more descriptive and narrative fashion.

**CUPA Corrective Action:** Our annual summary report did include a list of deficiencies with a plan of correction and/or a status update. The copies of annual reports (Report 1-6) have been reported to the State on a timely fashion. However, the remaining items such as activities related to single fee system, making the Unified Program consistent, fee accountability and new ordinances were left out since there were no changes. For the 2005-06 Self-Audit report, the Glendale CUPA will make sure that all required elements are discussed in a narrative format regardless the lack of any new changes in any activity during that period.

2. **Deficiency:** The CUPA is not inspecting HMRRP facilities once every three years.

**CUPA Corrective Action:** Presently the Glendale CUPA is in full force with respect the number of Inspectors. The 2005-06 inspection number are looking very promising and will surpass all our expectations.

3. **Deficiency:** The CUPA is not inspecting Hazardous Waste Generators once every three years.

**CUPA Corrective Action:** Same response as number 2 above.

4. **Deficiency:** The CUPA documents return to compliance upon re-inspection facilities, however, certification of return to compliance from the facilities found to have minor violations is not obtained.

**CUPA Corrective Action:** Presently, the Glendale Fire CUPA is in process of updating and upgrading our database and various report formats available for Inspectors. The new format will include a separate area for businesses to certify their return to compliance and be able to mail the form back to CUPA.

5. **Deficiency:** The CUPA is not always detailing observations made at the facility and the factual basis for alleging those violations in the inspection reports. During the file, I observed inspection reports that only listed the general corrective measure.

**CUPA Corrective Action:** Presently, the Glendale Fire CUPA is in process of updating and upgrading our database and various report formats available for Inspectors. The new inspection form will have a "Comment" field immediately next to the violation description field where the Inspector will have ample space to describe the violation in detail and even suggest certain remedies to resolve the situation properly and diligently.

6. **Deficiency:** The CUPA is not taking formal enforcement actions on cases where Class I hazardous waste violations are identified. Annual Summary Reports identified Class I violations that were not followed up with a formal enforcement action.

**CUPA Corrective Action:** We conducted in-house training for Inspectors to reinforce their knowledge regarding "Formal Enforcement Action" and Class I violations. At the same time, each Inspector received a copy of our Enforcement Policy and associated paperwork required for pursuing a formal enforcement action.

7. **Deficiency:** The CUPA is ensuring that PBR facilities are submitting their annual notification form to the CUPA; however, acknowledgement/reauthorization letter issued to the PBR facility for their onsite treatment activity was not found.

**CUPA Corrective Action:** This specific violation was negligence on the Inspector part since the Glendale CUPA has all required generic letter and forms that could be used by the staff to notify the business owner. The Inspector received in-house training and review of policy and procedures dealing with Tiered Permitting facilities.

8. **Deficiency:** The CUPA is not always providing an inspection report to the business within 65 days of completing a hazardous waste generator inspection. During the file review, when facility inspection occurred and there were no violations observed, inspection reports were not developed. Facilities did not receive an inspection report.

**CUPA Corrective Action:** Inspectors were contacted and informed about this deficiency. At this point, when a facility inspection takes place, an inspection report is generated whether or not a violation was observed or not.

Should you have any questions regarding this report, please feel free to call me at (818)548-4030 or e-mail me at [vdemirjian@ci.glendale.ca.us](mailto:vdemirjian@ci.glendale.ca.us)

*Vasken Demirjian*

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